

EXHIBIT A

STATE OF SOUTH CAROLINA) IN THE COURT OF COMMON PLEAS
COUNTY OF RICHLAND) FIFTH JUDICIAL CIRCUIT

Dominique B. Lovejoy,) Case No: 2023-CP-40- 05251
Plaintiff,)
- vs -)

**SUMMONS
(JURY TRIAL DEMANDED)**

Jason L. Richardson, Rocket Expediting,)
LLC, Super Ego Holdings, LLC, Super Ego)
Logistics, LLC, Stefan Perovic, and)
Sendmee Trucking, LLC,)
Defendants.)

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the Plaintiff or their attorney, Bennett E. Casto, at his office, 119 East Main Street, Lexington, SC 29072-3420, within thirty (30) days after the service hereof, exclusive of the day of such service, and if you fail to answer the Complaint within the time aforesaid, the Plaintiff in this action will apply to the Court for the relief demanded in this Complaint.

MCWHIRTER, BELLINGER, & ASSOCIATES, P.A.

s/Bennett E. Casto
Bennett E. Casto (SC Bar #76708)
119 East Main Street
Lexington, South Carolina 29072
(803) 359-5523 Phone
(803) 996-9080 Fax
Bennett@mcwhirterlaw.com
Attorney for the Plaintiff

Lexington, South Carolina
October 4, 2023

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FIFTH JUDICIAL CIRCUIT
COUNTY OF RICHLAND)	

Dominique B. Lovejoy,)	Case No: 2023-CP-40- 05251
)	
Plaintiff,)	
)	
-vs-)	
)	

**COMPLAINT
(JURY TRIAL DEMANDED)**

Jason L. Richardson, Rocket Expediting,)
LLC, Super Ego Holdings, LLC, Super Ego)
Logistics, LLC, Stefan Perovic, and)
Sendmee Trucking, LLC,)
)
Defendants.)
)

TO: THE ABOVE-NAMED DEFENDANTS:

Upon information and belief, the Plaintiff respectfully alleges and will show the following:

1. Plaintiff Dominique B. Lovejoy (hereinafter “Plaintiff”) is a citizen and resident of the County of Lexington, State of South Carolina.

2. Upon information and belief, Defendant Rocket Expediting, LLC (hereinafter “Rocket”) is a company organized and existing under the laws of Ohio, with its principal place of business being located at 2939 Kenny Road, Suite 220, Columbus OH 43221. Defendant Rocket is a federally regulated motor carrier engaged in providing transportation services to the shipping public and is an “authorized carrier within the meaning of 49 C.F.R. § 376.2(a). Upon further information and belief, Rocket, in conjunction with Defendants Super Ego Holdings, Super Ego Logistics, and Perovic contract with drivers to transport its customers’ freight in interstate commerce. As part of its business, Rocket, in conjunction with Defendants Super Ego Holdings, Super Ego Logistics, and/or Perovic leases equipment to or from other related entities and/or owner-operators. Rocket is registered under Motor Carrier No.: 807590 and US Dept. of

Transportation No. 2356464. At all relevant times, Rocket in conjunction with the aforementioned Defendants did business in South Carolina through its agents, servants and employees, including but not limited to Defendant Richardson and/or the other named Defendants.

3. Upon information and belief, Defendant Super Ego Holdings, LLC (hereinafter “Super Ego Holdings”) is a company organized and existing under the laws of Illinois, and at all times herein mentioned, doing business in South Carolina through its agents, servants and employees. Upon further information and belief, Defendant Super Ego Holdings is an Illinois limited liability company with a principal office located at 677 North Larch Ave, Elmhurst, IL 60126, who employs or contracts with drivers to transport its customers’ freight in interstate commerce through its subsidiaries, and affiliates (including but not limited to the other named Defendants in this action).

4. Upon information and belief, Defendant Super Ego Logistics, LLC (hereinafter “Super Ego Logistics”) is a company organized and existing under the laws of Illinois, and at all times herein mentioned, doing business in South Carolina through its agents, servants and employees. Upon further information and belief, Defendant Super Ego Logistics is an Illinois limited liability company with a principal office located at 621 IL Route 83, Suite 240, Bensenville, IL 60106, who employs or contracts with drivers to transport its customers’ freight in interstate commerce through its subsidiaries, and affiliates (including but not limited to the other named Defendants in this action).

5. Upon information and belief, Defendant Stefan Perovic (hereinafter “Defendant Perovic”) is an individual who resides at 175 North Harbor Drive, Suite 1716, Chicago Illinois 60601. Upon further information and belief, Defendant Perovic is an agent, employee or servant who in

conjunction with Defendants Super Ego Holdings, Super Ego Logistics, and Rocket Expediting, owns the tractor and/or trailer involved in the collision which is the subject of this litigation, and at all relevant times did so within the scope and course of his employment and within his capacity as an agent, employee or servant of Defendants Rocket, Super Ego Holdings, and/or Super Ego Logistics and as such Defendants Rocket, Super Ego Holding, and/or Super Ego Logistics is liable for his actions under the doctrine of respondeat superior.

6. Defendant Sendmee Trucking, LLC (hereinafter “Sendmee”) is upon information and belief, a company organized and existing under the laws of the State of Alabama, and at all times relevant herein, doing business in the State of South Carolina through its agents, servants and employees. Upon further information and belief, Defendant Sendmee Trucking, LLC has its principal office located at 1945 Doovertown Road, in Cordova, AL 35550, and Defendant Richardson owns and operates Sendmee Trucking, LLC along with his wife Tammy Richardson.

7. Defendant Jason Richardson (hereinafter “Defendant Richardson”) is, upon information and belief, a citizen and resident of Walker County, Alabama, who was operating the tractor-trailer which caused the collision that is the subject of this litigation, and who at all relevant times was doing so in his capacity as an agent, employee or servant of Defendants Rocket, Super Ego Holdings, Super EgoLogistics, Sendmee and/or Perovic.

8. The incident which is the subject of this Complaint occurred in the County of Richland, State of South Carolina.

9. Venue is appropriate in Richland County, South Carolina pursuant to S.C. Code Ann. § 15-7-30.

FACTS

10. Plaintiff incorporates herein by reference the allegations of the previous paragraphs of

this Complaint as if each were fully set forth herein in their entirety.

11. On or about April 10, 2023, Plaintiff was operating 2015 Nissan Versa driving west on Interstate 26 in Irmo, South Carolina, County of Richland. Plaintiff was stopped on the interstate due to the traffic ahead.

12. On the same date and at the same time, Defendant Richardson was operating a 2017 International tractor trailer also headed west on Interstate 26 driving several car lengths behind Plaintiff. Plaintiff, along with several other vehicles, were stopped for traffic. Defendant, driving too fast for conditions, was unable to stop his 77,000-pound tractor trailer and rear-ended a vehicle causing a chain reaction into three (3) more vehicles, the Plaintiff being the last one to be rear-ended.

13. Upon information and belief, Defendant Richardson owned and/or operated the subject tractor and trailer in conjunction with, or as an agent, employee or servant of Defendants Super Ego Holdings, Super Ego Logistics, Rocket, Sendmee, and/or Defendant Perovic.

14. Upon information and belief, Defendant Richardson, in conjunction with Defendants Super Ego Holdings, Super Ego Logistics, Rocket, Sendmee, and/or Defendant Perovic had falsified Defendant Richardson's daily driver's log which permitted Defendant Richardson to drive more hours than he was allowed to under federal and state law. Upon further information and belief, Defendant Richardson was driving fatigued and distracted, failed to notice an obviously stopped vehicles in the roadway, and failed to take appropriate steps to avoid the collision or lessen the impact to Plaintiff's vehicle.

15. As a result of the wreck, Plaintiff suffered physical harm and injuries to his neck, right wrist, right knee, back, head, and other body parts, which have caused and in the future will cause Plaintiff to undergo physical pain, suffering, mental anguish, emotional distress, and permanent

impairment of health and bodily efficiency, lost wages, and has caused and will in the future cause Plaintiff to have to spend money for medical services and has caused and will in the future cause Plaintiff to lose money in the nature of wages and earnings.

16. As a further result of the above, Plaintiff's vehicle was a total loss which caused Plaintiff to be without the use of a vehicle for a great period of time and will cause Plaintiff to suffer tremendous financial and emotional hardship.

FOR A FIRST CAUSE OF ACTION
(Negligence, Gross Negligence, Negligence *per se* as to all Defendants)

17. To each and every allegation of this Complaint, which is not inconsistent with this cause of action is hereby realleged and reincorporated by reference as if set forth verbatim herein.

18. That the wreck and resulting injuries Plaintiff sustained were a direct and proximate result of the negligent, careless, reckless, willful, and wanton acts and delicts of Defendants, in the following particulars, to wit:

- a. In driving too fast for conditions;
- b. In failing to yield the right of way to Plaintiff;
- c. In failing to maintain proper control of his vehicle;
- d. In failing to maintain a proper lookout;
- e. In operating the vehicle in an unlawful and reckless manner;
- f. In failing to exercise due care under the circumstances to avoid injury and damage to other, especially the Plaintiff;
- g. In operating the vehicle on the highway without regard for the rights of others;
- h. In operating the vehicle with defective brakes or, if said brake were not defective, in failing to apply his brakes in time, if any he had;

- i. In violating the Federal Motor Carrier Safety Regulations, regarding but not limited to Hours of Service Regulations;
- j. In driving fatigued; and
- k. In other such particulars as the evidence at trial may show.

19. All of the above are in violation of the statutory and common laws of the State of South Carolina and the rules and regulations promulgated by the South Carolina Department of Transportation and the Federal Motor Safety Carrier Administration.

20. As the direct and proximate cause of the aforesaid negligence, carelessness, recklessness, willfulness, and wantonness of Defendants, as set forth above, Plaintiff sustained injuries including pain and suffering, causing him shock and mental distress, and property damage; injuries for which Defendants are liable to the Plaintiff's actual and punitive damages in an amount to be determined by the triers of the facts.

FOR A SECOND CAUSE OF ACTION
(Negligent Hiring, Training, and Supervision as to Defendants, Rocket, Super Ego Holdings, Super Ego Logistics, Sendmee, and Perovic)

21. Plaintiff repeats and reiterates the above allegations not inconsistent herewith as if repeated verbatim.

22. At all times herein-referenced, Defendant Richardson was under the hire, training, control and supervision of Defendants Rocket, Super Ego Holdings, Super Ego Logistics, Sendmee, and/or Perovic.

23. At all relevant times herein-referenced, Defendants Rocket, Super Ego Holdings, Super Ego Logistics, Sendmee, and/or Perovic knew of or had reason to know of its employees and the ability and means to hire, train, control and supervise the conduct and actions of them.

24. Defendants Rocket, Super Ego Holdings, Super Ego Logistics, Sendmee, and/or

Perovic negligently, grossly negligently, carelessly, recklessly, willfully and wantonly failed to properly hire, train, control and supervise the actions and conduct of Defendant Haley, in the following particulars, to wit:

- a. In failing to properly investigate the background of Defendant Richardson before hiring;
- b. In failing to train and instruct Defendant Richardson and its employees as to how to properly and safely operate a vehicle;
- c. In failing to remedy the improper conduct and actions of its employees;
- d. In failing to supervise what Defendant Richardson was doing while under Defendant Rocket, Super Ego Holdings, Super Ego Logistics, Sendmee, and/or Perovic's dispatch; and
- e. In such others as may be shown at trial.

25. As the direct and proximate cause of the aforesaid negligence, carelessness, recklessness, willfulness, and wantonness of Defendants, as set forth above, Plaintiff sustained injuries including pain and suffering, causing him shock, and mental distress, all to the plaintiff's actual and punitive damages in an amount to be determined by the triers of the facts.

WHEREFORE, Plaintiff prays for judgment against the Defendants for actual and punitive damages that will fully, fairly, and justly compensate them for injuries sustained and for such other and further relief as may be deemed appropriate by a jury.

The Plaintiff demands a jury trial.

Respectfully submitted,

MCWHIRTER, BELLINGER, & ASSOCIATES, P.A.

s/Bennett E. Casto

Bennett E. Casto (SC Bar #76708)

119 East Main Street

Lexington, South Carolina 29072

(803) 359-5523 Phone

(803) 996-9080 Fax

Bennett@mcwhirterlaw.com

Attorney for the Plaintiff

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